

EXHIBIT # L

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< 1 Hough v. Maraj -- Dkt. No... >

From: Judd Burstein <jburstein@burlaw.com>
Date: January 12, 2022 at 3:38:40 PM EST
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Subject: RE: Hough v. Maraj -- Dkt. No.
210CV-04568 (E.D.N.Y.)

Counsel:

I am pleased to see that you and Ms. Hough have come to your senses and have dismissed this appalling lawsuit against Nicki Minaj, which has inexcusably wasted my time and her money over the past three months. In my view, your conduct in pursuing this case against Nicki represents the worst of our legal system: bottom-feeding lawyers who pursue frivolous actions against a celebrity assuming that they will be paid off if they throw up enough dirt. As I told you during our one virtual meeting, Nicki would **never** pay a dime to your client. I was correct. You ultimately were forced to surrender without you or your client receiving a penny.



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meeting, Nicki would **never** pay a dime to your client. I was correct. You ultimately were forced to surrender without you or your client receiving a penny.

In all events, while your dismissal of the Amended Complaint may be the end of your efforts to extort Nicki into a settlement, it is just the beginning of Nicki's and my efforts to make you pay for your disgraceful conduct with both money and, if the Court recommends it, disciplinary sanctions. You forced my client to spend over \$300,000 in fees to defend a case which even my Labradoodle, Gracie, could see was frivolous on both the facts and the law.

While you availed yourself of Rule 11's safe harbor provision to avoid having to defend against the sanctions motion with which I served you on Sunday, there are other Rule 11 motions which I served in 2021 and which I now intend to file. Further, I intend to seek sanctions against all of you pursuant to 28 U.S.C. § 1927 and/or the Court's inherent power.

Accordingly, I would like to agree upon a schedule for those motions, which we could then submit to the Court. I propose the following:

February 2, 2021:
February 22, 2021:

Our motion
Your answer



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Accordingly, I would like to agree upon a schedule for those motions, which we could then submit to the Court. I propose the following:

February 2, 2021:	Our motion
February 23, 2021:	Your answering papers
March 9, 2021:	Our reply.

Please let me know if this is acceptable.

Judd Burstein
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